

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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CENTRAL LABORERS' PENSION FUND )	Case No. 1:14-cv-01041-PAC
and STEAMFITTERS LOCAL 449 PENSION )	
FUND, derivatively on behalf of JPMorgan )	
Chase & Company, )	
Plaintiffs, )	
v. )	
JAMES DIMON, LINDA B. BAMMANN, )	
JAMES A. BELL, CRANDALL C. BOWLES, )	
STEPHEN B. BURKE, JAMES S. CROWN, )	
TIMOTHY P. FLYNN, LABAN P. JACKSON, )	
MICHAEL A. NEAL, LEE R. RAYMOND, )	
WILLIAM C. WELDON, WALTER V. )	
SHIPLEY, and ROBERT I. LIPP, )	
Defendants, )	
-and- )	
JPMORGAN CHASE & COMPANY, )	
Nominal Defendant. )	

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**NOTICE OF DEFENDANTS' MOTION TO DISMISS THE COMPLAINT FOR  
FAILURE TO MAKE A PRE-LITIGATION DEMAND**

PLEASE TAKE NOTICE THAT upon the accompanying memorandum of law, the Declaration of Stuart J. Baskin, executed April 28, 2014, and the exhibits attached thereto, Defendants James Dimon, Linda B. Bammann, James A. Bell, Crandall C. Bowles, Stephen B. Burke, James S. Crown, Timothy P. Flynn, Laban P. Jackson, Jr., Michael A. Neal, Lee R. Raymond, William C. Weldon, Walter V. Shipley, Robert I. Lipp, and Nominal Defendant JPMorgan Chase & Company, by their undersigned counsel, will move this Court, before Honorable Paul A. Crotty, United States District Judge, at the Daniel Patrick Moynihan

Courthouse, 500 Pearl Street, New York, New York, on a date and time to be set by the Court, for an Order dismissing this shareholder derivative action with prejudice pursuant to Federal Rule of Civil Procedure 23.1 and applicable Delaware law, and granting such other and further relief as the Court may deem just and proper.

Dated: New York, New York  
April 28, 2014

SHEARMAN & STERLING LLP

By: /s/ Stuart J. Baskin  
Stuart J. Baskin  
Jaculin Aaron  
Jessica Lyn Bartlett  
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*Attorneys for Defendants Linda B. Bammann, James A. Bell, Crandall C. Bowles, Stephen B. Burke, James S. Crown, Timothy P. Flynn, Laban P. Jackson, Michael A. Neal, Lee R. Raymond and William C. Weldon*

WACHTELL, LIPTON, ROSEN & KATZ

By: /s/ John Savarese  
John Savarese  
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51 West 52nd Street  
New York, NY 10019  
(212) 403-1000

*Attorneys for Nominal Defendant JPMorgan Chase & Co. and Defendants James Dimon, Walter V. Shipley and Robert I. Lipp*

**CERTIFICATE OF SERVICE**

I, Jessica Lyn Bartlett, hereby certify that copies of:

the Notice of Defendants' Motion to Dismiss the Complaint for Failure to Make a Pre-Litigation Demand;

Memorandum of Law in Support of Defendants' Motion to Dismiss the Complaint for Failure to Make a Pre-Litigation Demand; and

the Declaration of Stuart J. Baskin in Support of Defendants' Motion to Dismiss the Complaint for Failure to Make a Pre-Litigation Demand and exhibits thereto

were filed with the Court's ECF system, which will send copies electronically to all counsel that have appeared in this action and registered with such system.

Dated: New York , New York  
April 28, 2014

  
A handwritten signature in black ink, appearing to read "Jessica Lyn Bartlett".